

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

FIRST BANK CHICAGO F/K/A FIRST	)	
BANK OF HIGHLAND PARK,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:23-CV-00643-MSN-JFA
v.	)	
	)	Judge Michael S. Nachmanoff
AMERICAN ELECTRIC POWER	)	
SERVICE CORPORATION,	)	Magistrate Judge John F. Anderson
	)	
Defendant.	)	

**JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER**

Plaintiff, First Bank Chicago (“Plaintiff”), and Defendant, American Electric Power Service Corporation (“Defendant,” collectively the “Parties”), through their respective attorneys of record, pursuant to Fed. R. Civ. P. 26(c), jointly move the Court for entry of the attached Stipulated Protective Order and state as follow in support:

1. The Parties contemplate that discovery in this action may involve the production or disclosure of confidential person, financial or business information, and/or competitive information.

2. To ensure the protection of such information from public disclosure, the Parties request entry of a Stipulated Protective Order in this case, a copy of which is attached hereto as **Exhibit 1**.

3. As evidenced by the electronic signatures of counsel for the Parties on the proposed Stipulated Protective Order, the Parties, by counsel, consent to jointly move to enter the attached Stipulated Protective Order.

4. Because the Parties have agreed to the entry of the proposed Stipulated Protective Order, no hearing on this Joint Motion is necessary unless desired by the Court.

5. Good cause exists for the entry of the Stipulated Protective Order.

WHEREFORE, Plaintiff, First Bank Chicago, and Defendant, American Electric Power Service Corporation, by counsel, respectfully request that the Court grant their Joint Motion and enter the attached Stipulated Protective Order.

Dated: December 1, 2023

Respectfully submitted:

/s/ Debbie Devassy Babu

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*Counsel for Defendant American Electric  
Power Service Corporation*

**CERTIFICATE OF SERVICE**

I certify that on December 1, 2023, I have electronically filed Joint Motion to Enter Stipulated Protective Order with the Clerk of Court using the ECF system which will send notification of such filing to First Bank Chicago.

Dated this December 1, 2023.

/s/ Michelle S. Kallen

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